

North American Association of Food Equipment Manufacturers
161 N. Clark St., Ste. 2020
Chicago, IL 60601

Mary D. Nichols
Chairman
California Environmental Protection Agency
Air Resources Board
1001 "I" Street
Sacramento, CA

RE: Public Comments on the Air Resources Board's Preparation of a Short Lived Climate Pollutant Strategy

Dear Ms. Nichols:

The North American Association of Food Equipment Manufacturers (NAFEM) appreciates the opportunity to submit some preliminary considerations as you further develop your climate pollution strategy as outline in your concept paper, Short-Lived Climate Pollutant (SLCP) Reduction Strategy.

NAFEM represents more than 500 members that manufacture commercial foodservice equipment and supplies for the food away from home market. These member companies make the tools used to prepare, cook, serve and store food safely, including a variety of refrigeration products ranging from blast chillers to coolers, deli cases, dispensers, freezers, ice makers, refrigerators and sno-cone or soft-serve ice cream machines.

NAFEM has a long history of supporting the prevention of climate change and the reduction of energy consumption. Working with federal agencies like the U.S. Environmental Protection Agency (USEPA) and the U.S. Department of Energy (USDOE), our members strive to make products more energy efficient where technologically and economically feasible in the North American market. To that end, while we do support reducing emissions that contribute to the Global Warming Potential (GWP), we believe that any transition to other refrigerants could have severe negative effects on the industry, the consumer, and the environment if established without consideration of a broad set of factors.

It is important to understand that any transition to alternative refrigeration will take a significant amount of time. Among the many factors to consider are technological and safety implications, the creation of a diverse product line that leads to a lengthy design cycle, and the potentially adverse effects some alternative refrigerants can have on energy efficiency and energy consumption. There are also important food safety issues that are essential in the development of commercial refrigeration products. If not taken seriously, these factors could have many unintended negative consequences, including loss of jobs and innovative products foodservice operators need to serve consumer demands.

NAFEM recommends the following considerations with regard to establishing an SLCP strategy:

1. Food safety and public health are the highest priority in commercial foodservice equipment designs.
2. Phase down targets and sensible GWP limits should be established.
3. All phase-down targets should be set based on engineering reviews of commercially available technology.
4. Notwithstanding the goal of an overall phase down, the overall carbon footprint of the product should be considered, including consideration that energy usage should not be sacrificed in the process.

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5. The commercial refrigeration category should be addressed by clear definition of product application groups. Many groups are not able to use refrigerants, such as CO₂ in their applications, have charge limits of 150gr (5.3oz), i.e. flammable refrigerants, or are regulated as VOC's by other agencies.
6. Current building codes are fragmented at the local, state and federal level and many jurisdictions do not allow flammable refrigerants.
7. Retrofitting is not possible with the use of many refrigerants in the self-contained segment. Therefore, it is important to be clear in the difference between "replace" and "retrofit".
8. Any solution for foodservice operators will be more successful with encouragement though incentives and other voluntary measures.

Additionally, as it relates to manufacturers' challenges to conversions to alternative refrigerants, NAFEM urges the consideration of the following:

1. A robust risk assessment review must take place regarding many issues, including, but not limited to: insurance, code allowances, facility updates, process and worker training.
2. There is a need to consider a multitude of restrictions found in major mechanical, fire and building codes in the U.S. and Canada.
3. Large capital investment to retool factories for use of flammable refrigerants (also referred to as "bomb-proofing").
4. Engineering resources are limited.
5. The commercial refrigeration industry needs to have compressor prototypes and alternate refrigerant blends available for new product development, safety testing and product introduction.
6. "Engineer to Order" products, which are common in our industry, follow a more complicated design cycle.
7. Safety and sanitation compliance (third-party testing issues, i.e., UL and NSF) timelines and constraints.
8. Customer support challenges, i.e., equipment installation, service and workforce training.

We believe the consideration of the above mentioned factors will contribute to a balanced, achievable, and environmentally sound strategy. NAFEM welcomes a constructive dialogue on these issues as the Board moves forward.

Respectfully Submitted,

Charlie Souhrada
Director of Member Services
North American Association of Food Equipment Manufacturers
161 N. Clark Street, Suite 2020
Chicago, IL USA 60601
Phone: +1.312.821.0212
Fax: +1.312.821.0202
csouhrada@NAFEM.org